UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: BRANDY JO ROHRBAUGH   : CHAPTER 13
       Debtor   :
                                        :
JACK N. ZAHAROPOULOS   :
STANDING CHAPTER 13 TRUSTEE   :
       Movant   :
                                        :
       vs.   :
                                        :
BRANDY JO ROHRBAUGH   :
       Respondent   : CASE NO. 1-24-bk-00697

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 16th day of May 2024 comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. Debtor(s)' plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7.   More specifically, the debtor has excess non-exempt equity in the following:

      a.   Residential real estate. The Trustee has requested proof of the value of the debtor(s) home as stated in his/her schedules.

2. The debtor has not demonstrated that all tax returns have been filed as required by § 1325(a)(9).

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WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

    a. Deny confirmation of debtor(s) plan.
    b. Dismiss or convert debtor(s) case.
    c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Roeder
        Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day of May 2024, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

JOHN M HYAMS ESQUIRE
2023 N 2ND STREET, SUITE 203
HARRISBURG, PA   17102-

/s/Tammy Life
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee